## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JANE DOE 43.

Plaintiff,

VS.

JEFFREY EPSTEIN, GHISLAINE MAXWELL, SARAH KELLEN, LESLEY GROFF, AND NATALYA MALYSHEV

Defendants.

**CASE NO. 17 Civ 616 (JGK)** 

## **NOTICE OF MOTION**

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law and declaration of Michael C. Miller (with exhibits), Defendants Jeffrey Epstein and Lesley Groff ("Defendants") will move the Court, pursuant to Fed. R. Civ. P. 9(b), 10(a), 12(b)(2) and (6), 12(f), and before the Honorable John G. Koeltl, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, as soon as counsel may be heard, for an Order (1) granting the Defendants' motion to dismiss the First Amended Complaint; (2) striking a portion of the First Amended Complaint if the motion to dismiss is not granted; (3) requiring Plaintiff to amend the caption to proceed in her own name; and (4) any other relief the Court deems just and proper.

Dated: New

New York, New York November 21, 2017

Michael C. Miller

Justin Y.K. Chu

Yours, etc.

Michael A. Keough

Steptoe & Johnson, LLP

1114 Avenue of the Americas

New York, New York 10036

(212) 506-3900

mmiller@steptoe.com

jchu@steptoe.com

Counsel for Jeffrey Epstein and Lesley Groff